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July 19, 2005

Ex Parte

Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: WT Docket No. 02-353, Service Rules for Advanced Wireless Service in the
1.7 and 2.1 GHz Bands

Dear Ms. Dortch:

On July 18, 2005, Donald Brittingham and Charla Rath met with John Branscome of Commissioner Kathleen Abernathy's office to discuss Verizon Wireless' proposal to revise the Advanced Wireless Services (AWS) band plan as indicated in the attached and for the reasons set forth in our May 27, 2005 ex parte filing in this docket.

We noted the importance of placing the MSA/RSA license in the A Block so that bidders could efficiently aggregate the EA and REAG "building blocks." We also noted that Verizon Wireless initially supported the adoption of a 30 MHz license and that it still believes it is important that the Commission adopt a band plan that permits carriers to acquire enough contiguous spectrum to provide capacity for more advanced services. We believe that the most flexible way for the Commission to accomplish this is to adopt the band plan that Verizon Wireless previously proposed (attached). That plan uses two 20 MHz REAGs as essential building blocks and would permit bidders several different ways to efficiently aggregate 30 MHz of spectrum. A plan that reduced to one the number of 20 MHz REAGs would also reduce bidders' flexibility. However, we noted that if the Commission were to adopt a plan with only one 20 MHz REAG, it should place it between a 10 MHz REAG and a 10 MHz EA, thus permitting the efficient aggregation of the 20 MHz REAG with *either* another REAG or an EA. Though not ideal, in this manner the Commission could provide for greater flexibility and would preserve the rationale for including both a 20 MHz REAG and a 30 MHz REAG in its original band plan.¹

¹ Larger spectrum blocks enable "a broader range of broadband services, including Internet access at faster speeds" and "provide operators with additional capacity, and, importantly, with greater flexibility." See *AWS Service Rules* at ¶44.

July 19, 2005

Page 2

Pursuant to section 1.1206(b)(2) of the Commission's rules, an electronic copy of the letter is being filed for inclusion in the above-referenced docket. Please direct any questions regarding this filing to the undersigned.

Sincerely,

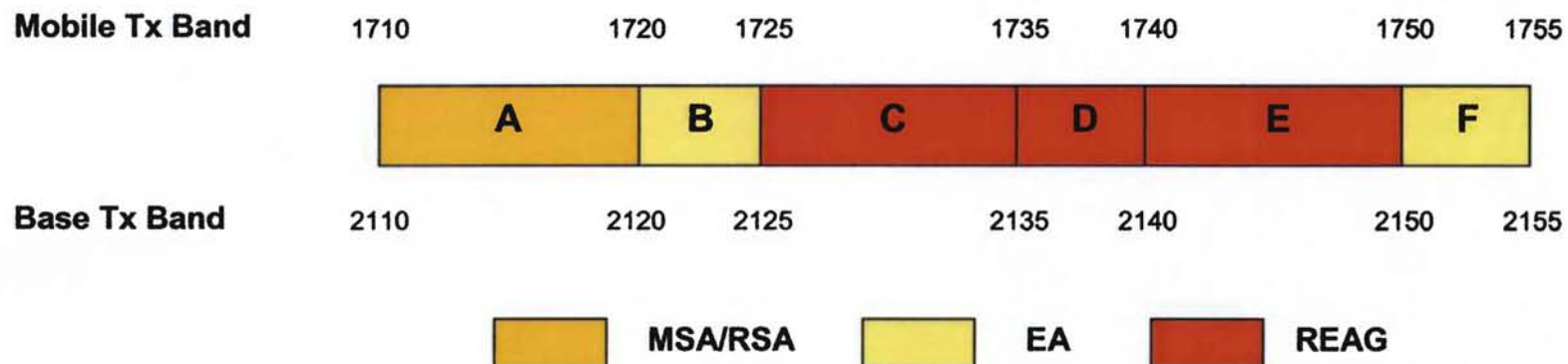
A handwritten signature in blue ink, appearing to read "Charla M. Rath". The signature is fluid and cursive, with the first name "Charla" being more prominent.

Charla M. Rath

Attachment

cc: John Branscome

Proposed Band Plan for Advanced Wireless Services (AWS) in the 1710-1755 / 2110-2155 MHz band



- Facilitates more efficient aggregation of spectrum blocks
- Provides more flexibility for prospective licensees
- Supports acquisition of 30 MHz blocks without requiring 30 MHz licenses
- Accommodates rural carriers' desire for 20 MHz MSA/RSA licenses